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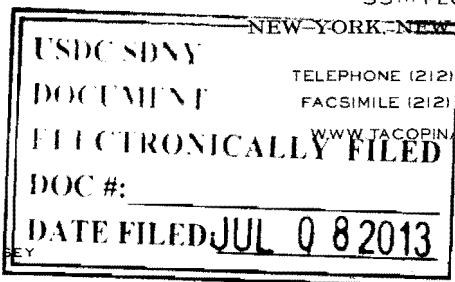
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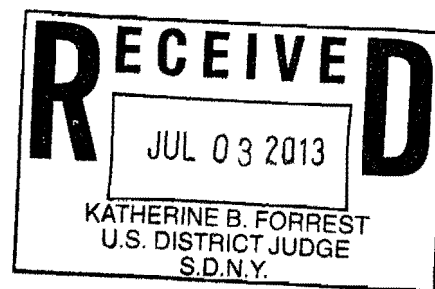
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July 1, 2013

VIA ECF AND FEDERAL EXPRESS

Hon. Katherine B. Forrest
United States District Judge
United States District Court
Southern District of New York
Courtroom: 15A
500 Pearl Street
New York, New York 10007-1312



Re: Baiul v. NBCUniversal Media, LLC et al
Case Number: 1:13-cv-02205-KBF

Baiul et al v. Disson et al
Case Number: 1:13-cv-02208-KBF

Dear Judge Forrest:

I am associated with Tacopina, Seigel & Turano, P.C., counsel for Defendants Stephen Disson and Disson Skating, LLC in the above-referenced actions, which have been informally consolidated by Your Honor for purposes of discovery.

I write to respectfully request that Your Honor sign the enclosed proposed Protective Order, which is the exact form of the Model Protective Order 2 from Your Honor's Individual Practices page of the Court's website. Defendants NBC Universal Media, LLC and NBC Sports Network, L.P. join in this request.

Plaintiffs object to the proposed order because the confidentiality designations and protections would remain in effect through trial unless a party challenges the confidentiality designation of any document. Plaintiffs take the position that the confidentiality designations and protections should automatically cease upon the commencement of trial at which point a party would have no obligation to keep a previously-designated document confidential either

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within or without the context of the litigation. The parties have had numerous communications in an attempt to resolve this issue without Court intervention, but such attempts have not been successful.


All Defendants respectfully submit that Model Protective Order 2 was implemented by the Court after due consideration of all potential concerns for all types of litigants, and that it would not have been promoted by Your Honor unless Your Honor believes that it is reasonable and just.

Furthermore, all Defendants respectfully submit that if Plaintiffs have any concern or objection with respect to any confidentiality designation, Plaintiffs have a remedy under the proposed order to challenge same. On the other hand, having an automatic end to all protections upon the commencement of trial would not only defeat the purpose of Model Protective Order 2, but would inevitably lead to the parties' counsel overburdening their respective clients and the Court with unnecessary discovery disputes at the commencement of trial. Prior to trial, all parties will have a sufficient understanding concerning the documents that each intends to use at trial, and from that limited set of documents, the parties can meet and confer over confidentiality designations at that time.

Plaintiffs' proposed ending of all protections at trial would lead the parties to have disputes over every single document ever produced herein with a confidential designation. Therefore, Your Honor will likely have to resolve confidentiality disputes concerning documents that the parties do not even intend to use at trial and might even consider irrelevant to the claims being tried.

Based upon the foregoing, all Defendants respectfully request that Your Honor sign the enclosed order.

Respectfully submitted,

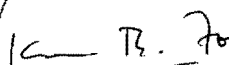


Matthew G. DeOreo

cc: All counsel by ECF

Encl.

Ordered

The Court will resolve particular issues re particular documents as to which there is a confidentiality designation / trial exhibit designation, pre-trial. 
KBF
USDJ 7/8/13